

CLINTON BROWN, Pro Se
16821 Edgar Street
Pacific Palisades, CA 90272
clinton@atlasinc.solar
310-487-6453

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,
Plaintiff,

vs.

CLARK R. TAYLOR, AICP, THE
LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL
PLANNING,
Defendant.

CASE NO. 2:22-cv-09203-MEMF-KS

NOTICE OF NO REPLY

Judge: Honorable Maame Ewusi-
Mensah Frimpong

Magistrate Judge: Karen L.
Stevenson

Action Filed: 12/17/2022

Action Due: 01/13/2023

NOTICE OF NO REPLY

NOTICE TO THE COURT, under Federal law 28 U.S.C. § 636(b)(1)(C), the Plaintiff has a statutory right to *de novo* review, unaffected by the Defendant's reliance on Local Rules. *F.R.C.P.* 83(a) and (b) allow this Court to make its own local rules that are consistent and not contrary to the will of Congress.¹

THEREFORE, Defendant's REPLY or OPPOSITION should be excluded from the *de novo* review. (Dk. 55).

¹ 28 U.S.C. Appendix, 311, 1995 Amendment.

“I, **Clinton Brown**, solemnly swear that I am submitting this filing with the Court, and that:

- (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.”

“I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.”



Clinton Brown

05/25/2023